

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
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**STIPULATION AND ORDER PURSUANT TO 11 U.S.C. § 362(d)
MODIFYING THE AUTOMATIC STAY IMPOSED BY 11 U.S.C. § 362(a)**

WHEREAS The Township of Mount Carmel, Pennsylvania (“**Requesting Party**”) asserts that it holds a tax lien on the lands and premises previously owned by James E. Nolter with an address of 131 Girard Street, Atlas, Pennsylvania 17851 (the “**Mortgaged Property**”);

WHEREAS the relevant land records reflect that GMAC Mortgage, LLC, one of the above-captioned debtors (the “**Debtors**” and, together with Requesting Party, the “**Parties**”) holds, or previously held, a lien on the Mortgaged Property;

WHEREAS the Requesting Party has requested (“the **Request**”) relief from the automatic stay, pursuant to section 362(d) of title 11 of the United States Code (the “**Bankruptcy Code**”), to commence and/or complete the foreclosure of its interest in the Mortgaged Property;

WHEREAS the Debtors have agreed to consent to the Request on the terms and conditions contained in this Stipulation and Order;

NOW, THEREFOR, it is hereby stipulated and agreed as between the Parties to this Stipulation and Order, through their undersigned counsel; and after due deliberation and sufficient cause appearing, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Request is granted as set forth herein.
2. To the extent applicable, the automatic stay imposed in this case by section 362(a) of the Bankruptcy Code is modified under section 362(d) of the Bankruptcy Code to the extent necessary to allow Requesting Party to commence and complete the foreclosure of the lien it holds on the Mortgaged Property.
3. Nothing in this Stipulation and Order shall be deemed to affect in any way the rights of any entity, including the Debtors and The ResCap Liquidating Trust, to contest the validity, priority, or amount of any or all of Requesting Party's lien in the Mortgaged Property with respect to any other lien on the Mortgaged Property in any foreclosure proceeding.
4. This Stipulation and Order may not be modified other than by a signed writing executed by the Parties hereto and by further order of the Court.
5. This Stipulation and Order may be executed in multiple counterparts, each of which shall be deemed an original but all of which when taken together shall constitute one and the same instrument.
6. Pursuant to Bankruptcy Rule 4001(a)(3), the 14-day stay of this Stipulation and Order imposed by such Bankruptcy Rule is waived. Requesting Party is authorized to implement the provisions of this Stipulation and Order immediately upon its entry.

7. This Court shall retain jurisdiction with respect to all matters arising from
or related to the implementation and interpretation of this Stipulation and Order.

<p>GMAC MORTGAGE, LLC</p> <p>By: <u>/s/ Norman S. Rosenbaum</u> Norman S. Rosenbaum Erica J. Richards James A. Newton MORRISON & FOERSTER LLP 250 West 55th Street New York, New York 10019 Telephone: (212) 468-8000 Facsimile: (212) 468-7900</p> <p><i>Counsel for the Post-Effective Date Debtors and The ResCap Liquidating Trust</i></p>	<p>THE TOWNSHIP OF MOUNT CARMEL, PENNSYLVANIA</p> <p>By: <u>/s/ Robert K. Varano</u> Robert K. Varano COLE & VARANO LAW FIRM 110 S. Oak Street Mount Carmel, PA 17851 Phone: (570) 339-5870 Facsimile: (570) 339-4670</p> <p><i>Counsel for The Township of Mount Carmel, Pennsylvania</i></p>
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IT IS SO ORDERED.

Dated: October 17, 2014
New York, New York

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge